

# EXHIBIT C

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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PEOPLE OF THE STATE OF NEW YORK, by  
LETITIA JAMES, Attorney General of the  
State of New York,

Petitioner,

Index No. 451685/20

-against-

**Motion Seq. No.: 002**

THE TRUMP ORGANIZATION, INC.,  
DJT HOLDINGS LLC, DJT HOLDINGS MANAGING  
MEMBER LLC, SEVEN SPRINGS LLC,  
ERIC TRUMP, CHARLES MARTABANO,  
MORGAN, LEWIS & BOCKIUS, LLP, and  
SHERI DILLON,

Respondents.

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**MEMORANDUM OF LAW OF THE TRUMP ORGANIZATION, INC.  
DJT HOLDINGS LLC, DJT HOLDINGS MANAGING MEMBER LLC,  
SEVEN SPRINGS, LLC AND ERIC TRUMP IN OPPOSITION TO  
THE OFFICE OF THE ATTORNEY GENERAL'S PETITION  
AND MOTION TO COMPEL COMPLIANCE  
WITH INVESTIGATORY SUBPOENAS**

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].<sup>9</sup> Based on these definitions, [REDACTED] fall well outside the scope of the OAG's investigation.

Indeed, during "meet and confer" communications with TTO, the OAG confirmed to counsel for TTO that the OAG [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

TTO has fully cooperated with the OAG's investigation during the last 18 months, having produced voluminous records and multiple witnesses, interspersed with numerous meet-and-confer sessions. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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<sup>9</sup> [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dated: New York, New York  
September 16, 2020

/s/ *Amy Carlin*

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/s/ *Alan S. Futerfas*

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